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U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

March 9, 2021

BY ECF

The Honorable Andrew L. Carter, Jr. United States District Court Judge Southern District of New York 40 Foley Square New York, New York 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC#: 3/12/21 DATE FILED:

United States v. Ronald Romano, 20 Cr. 585 (ALC)

Dear Judge Carter:

The Government respectfully writes, with the consent of the above-referenced defendant's counsel, to request an adjournment of the status conference, currently scheduled for March 15, 2021, at 10:00 a.m. During the next few weeks, the Government anticipates production to the defense of additional discovery consisting primarily of a large volume of email and electronic correspondence. Accordingly, the parties request a forty-five day adjournment of the status conference. The Government further requests, with the consent of the defendant's attorney, Mark Macron, Esq., that time be prospectively excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), until the date of the next conference. The exclusion of time will enable the Government to complete the production of discovery and the defense time to review that discovery and consider possible motion practice.

The application is **GRANTED**. The telephone status conference is adjourned to 4/23/21 at 11:30 a.m. Time excluded.

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So Ordered.

Respectfully submitted,

AUDREY STRAUSS United States Attorney for the Southern District of New York

By:_

Nicholas W. Chiuchiolo Timothy V. Capozzi **Assistant United States Attorneys**

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cc: Mark Macron, Esq.